

3. Plaintiffs have served the subpoena referenced in Docket No. 68 and Plaintiff agrees to suspend the subpoena and will not seek enforcement of the subpoena until the Court resolves the Motion to Dismiss. To the extent necessary, Titeflex reserves its right to file a Motion to Quash the Subpoena until the Motion to Dismiss For Lack of Subject Matter Jurisdiction is resolved.

4. Until the Court resolves the Motion to Dismiss for Lack of Subject Matter Jurisdiction, the parties agree that discovery will be limited to the issues identified in Titeflex's Motion to Dismiss For Lack of Subject Matter Jurisdiction. Plaintiffs have already served written discovery on these topics and has requested the deposition of Dave Oehlers. The parties have agreed to complete written jurisdictional discovery on or before April 10, 2014 and to complete the deposition of Dave Oehlers between April 15, 2014 and April 24, 2014.

5. The Parties agree that Plaintiffs' Response to the Motion to Dismiss shall be due on May 15, 2014. Titeflex's Reply Brief shall be due as required under the Federal Rules of Civil Procedure, the Local Rules for this Court and Judge Sharp's practice manual. This request for extension is requested to allow the Parties sufficient time to complete jurisdictional based discovery.

WHEREFORE, the Parties respectfully requests the Court grant their Joint Motion for a Stay of Merit Discovery and Set Briefing Schedule.

RESPECTFULLY SUBMITTED,

Quist, Cone & Fisher, PLLC

By: /s/ Michael Durr
Michael A. Durr
800 South Gay Street
Suite 2121,
Knoxville, TN 37929
Direct: 865.312.0440
E-mail: mdurr@qcflaw.com

Counsel for Plaintiffs

ADAMS AND REESE, LLP

By: /s/ Rocklan W. King III
ADAMS AND REESE, LLP
F. Laurens Brock (#017666)
820 Broad Street, Suite 201
Chattanooga, Tennessee 37402
Tel: (423) 475-6848
larry.brock@arlaw.com

ADAMS AND REESE, LLP
Rocklan W. King III (#030643)
424 Church Street, Suite 2800
Nashville, Tennessee 37219
Tel: (615) 259-1450
rocky.king@arlaw.com

FARELLA BRAUN + MARTEL LLP
Carl E. Switzer (admitted Pro Hac Vice)
Unnati Gandhi (admitted Pro Hac Vice)
235 Montgomery Street
San Francisco, California 94104
Telephone: (415) 954-4400
cswitzer@fbm.com
ugandhi@fbm.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent via the Court's CM/ECF system to Mr. Michael Durr, Plaintiff's Counsel. Copies may also be accessed through the Court's electronic filing system.

This 24th day of March 2014.

By: /s/ Rocklan W. King III